

## **FINAL MEETING SUMMARY**

### **HANFORD ADVISORY BOARD RIVER AND PLATEAU COMMITTEE**

*June 12, 2002*

*Richland, WA*

#### **Topics in this Meeting Summary**

Solid Waste Environmental Impact Statement (SW-EIS) .....	1
K-Basin Plant Update .....	3
Committee Business.....	4
Handouts .....	4
Attendees.....	5

*This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.*

The River and Plateau Committee (RAP) agreed to accept the corrections to the May 9 meeting summary provided by Dennis Faulk, and adopt the summary without further revision.

#### **Solid Waste Environmental Impact Statement (SW-EIS)**

Gariann Gelston provided a review of the previous work done by the Committee on the SW-EIS, and asked the committee issue managers to provide their thoughts on the current draft. Dirk Dunning provided a detailed list of comments for the committee to consider. Dirk agreed to forward his comments to the committee for inclusion in any draft advice produced. Gerry Pollet offered a review of what past HAB advice had said with regards to waste importation and other key issues within the SW-EIS.

Mike Collins, DOE-RL, provided the committee with a brief overview of the site's work on the SW-EIS over the last month, and of the feedback that the site had received regarding the EIS. Mike stated that DOE was looking forward to all comments on the EIS, whether good, bad, or indifferent, and that the site was working hard to meet the December 31 completion deadline.

Dave Johnson asked why the December 31 deadline was so firmly set. Mike said that if the EIS was not complete by that date, it might delay cleanup at other sites that wanted to ship waste to Hanford. Maynard Plahuta asked about the likely response to a recommendation by the HAB that DOE develop another draft of the EIS. Mike replied that DOE-HQ would review the recommendation, and that the site would possibly be directed to continue with the current version.

The Committee developed a list of high-level policy issues of concern in the SW-EIS, and agreed to use the list as the framework for a piece of advice to present at the July Board meeting. Gariann, Gerry, Dirk and Maynard agreed to work to develop a piece of draft advice for review by the rest of the Committee.

### ***Committee Discussion***

- There seem to be conflicts between this document and the statements made in other NEPA documents released in the past, including the Programmatic Solid Waste EIS (PEIS) released by DOE-HQ. Quantities of waste to be stored at Hanford are much higher in the SW-EIS than in the PEIS.
- A committee member raised a general concern over the veracity and the accuracy of the modeling used in the SW-EIS to predict levels of contamination over time. Models employed in previous DOE analyses have been proven to be inapplicable, and the models used here apparently share the same assumptions.
- The SW-EIS may possibly not do enough to adequately fulfill the requirements of the NEPA permitting process. The NEPA process requires a detailed analysis and an explicit statement of conditions and outcomes that does not appear to be present in this document. One committee member raised the question of whether the current EIS was even legally usable, and whether a judge would issue an injunction against employing the EIS if the matter was brought to court.
- The HAB September board meeting takes place two weeks after the close of the comment period for the SW-EIS. Can DOE accept comments from the Board that are not drafted until the September board meeting? Mike said that DOE often accepts comments that are received for several weeks after the close of a comment period, and that adding comments issued at the September board meeting to the SW-EIS should not be a problem.
- The SW-EIS does not do enough to address the issues of hazardous waste and mixed low-level waste. Both of these waste types are present on the Hanford site, but neither seems to be clearly addressed. In particular, the requirement that mixed waste should only be stored and treated at Hanford, not disposed of, needs to be raised.
- Both pre-1970 and post-1970 TRU also need more attention – the current assumption seems to be that pre-1970 TRU does not need to be addressed, and that post-1970 TRU will automatically be shipped to the Waste Isolation Pilot Plant (WIPP) and does not need to be addressed in detail.
- The EIS needs to state more clearly the impact of the decision made here on other decisions and commitments made by DOE. In particular, DOE's position here on technetium and iodine, and the effect of that decision on the site's Superfund responsibilities, needs to be clearly spelled out.
- A great deal of the document seems to be filled with "EIS boiler-plate content" that does little to address the issues. There is a question of what changed in the document over the last four years, given that very little new analysis seems to have been done. The advice to DOE should perhaps be to go back and start over.
- The committee should capture as many key points and issues of concern as possible in its July advice, for submittal to DOE before the official close of the comment period. Extra comments can be submitted in September, but it would be best to issue as much substantive advice as possible now.

### ***Regulator Perspectives***

Fred Jamison, Ecology, provided his agency's perspective on the SW-EIS. Ecology has not had much time to read through the EIS, so their comments are still general, but their general concerns at present are much the same as those of the committee. In particular, Ecology is interested in confirming that the SW-EIS meets all the requirements for a NEPA process and addresses issues, such as transfer of waste between support sites, which were absent from the PEIS. Fred also provided a list of additional topics that Ecology hopes the EIS will address in its final version. Those topics include whether it contains sufficient analysis to support selection of specific disposal sites; that the HSW-EIS should emphasize waste minimization, treatment, avoidance of impacts, and support of cleanup activities not just waste disposal; and that the EIS should be particularly sensitive to impacts on land-use, cleanup schedules, transportation, habitat, and compliance with cleanup laws.

Dave Einan, EPA, provided agency comments as well. He stated that EPA has many of the same concerns as Ecology, and is working to collect a set of formal comments. EPA is in the process of conducting a NEPA adequacy review for the EIS. They are mainly concerned with identifying any planning elements that are not in the EIS. EPA hopes to issue a set of comments that go beyond suggesting that DOE avoid taking certain activities, and instead provide comments to DOE that identify what steps need to be taken for the plan outlined in the EIS to work.

Gerry asked both Dave and Fred if the regulatory agencies had been consulted in the development of the current draft. Neither Dave nor Fred could say for certain if their agencies had submitted formal development recommendations, but stressed that their statements were made because of lack of personal knowledge, not because those recommendations hadn't been included.

### **K-Basin Plant Update**

Steve Veitenheimer, DOE-RL, introduced himself as the manager of the K-basin project. He explained that he'd like to offer an update on the status of current plant operations and the construction of the new K-East plant, and then take questions from the Board.

Larry Earley, DOE-RL, provided an overview of the operations of the K-West facility. The facility is currently 56 days behind the original schedule, mainly because of continued equipment failures. Larry did state that the contractor is continually improving their response to equipment failure, replacing equipment more quickly and taking better efforts to insure that the replacement parts are more durable than the original. Steve stressed that the site intends to honor the original milestone, and believes that the contractor can make up the lost time over the next few months.

Stacy Helmann, DOE-RL, reported on the progress of construction for the new K-East facility. The fuel transfer system from K-East to K-West is on schedule, and will likely

be turned over to Operations before the end of June. The sludge-water containerizing system is not progressing as smoothly, however – the construction schedule on that element has slipped by two months since May, and the November milestone for completion may not be met. The site has contacted Fluor Hanford regarding this issue.

A committee member asked if there were any plans to change equipment, given that the current materials are apparently not as robust as they needed to be. Larry answered that changes and additions were made when possible. Steve added that equipment failures often happen in many places at once; so identifying the weak point that caused the initial breakdown is often not easy.

Larry Gadbois, EPA, commented on the continued frustration from regulators about equipment breakdown. In particular, he was concerned about the lack of work for facility staff whenever equipment broke down and the facility was taken off line. Steve acknowledged the problem and said that he was working with the contractor to set up other activities in parallel for site staff to work at while the facility was down.

### **Committee Business**

The Committee agreed to hold their usual conference call on Tuesday, June 18<sup>th</sup>, in order to discuss the SW-EIS draft advice under development. The call was scheduled for its usual time of 9 a.m.

Penny reminded the committee about the HAB Executive Issues call, scheduled for 3 PM on Friday, June 21<sup>st</sup>. Gariann agreed to participate in the call, as part of developing the July board agenda.

Penny reminded the committee members to make their hotel reservations for the July board meeting. The board meeting will be held on July 10<sup>th</sup> – 11<sup>th</sup>, which is a different set of days and a different week than the usual meeting.

The Committee agreed not to hold a meeting in July. The next committee meeting will be requested for Tuesday, August 6<sup>th</sup>. Depending on the scope of topics to be covered, the meeting may be scheduled as half day meeting. The exact time and agenda topics for the meeting will be finalized at a later date.

### **Handouts**

- RAP Draft Meeting Agenda; June 12, 2002.
- RAP Work Planning Table; October 17, 2001.

### **Attachment**

Flip Chart notes from the Solid Waste EIS discussion

---

**Attendees****HAB Members and Alternates**

Dave Johnson	Dave Watrous	Dirk Dunning
Gariann Gelston	Gordon Rogers	Gerald Pollet
Harold Heacock	Jim Curdy	Marty Bensky
Maynard Plahuta	Pam Brown	

**Others**

Michael Collins, DOE-RL	Rick Bond, Ecology	Scott Van Verst, WA Dept of Health
Mark French, DOE-RL	Alisa Huckaby, Ecology	Rodger Burns, EnviroIssues
Rob Pippo, Fluor Hanford	Fred Jamison, Ecology	Penny Mabie, EnviroIssues
Yvonne Sherman, DOE-RL	Craig Cameron, EPA	Nancy Myers, BHI
	Dave Einan, EPA	
	Larry Gadbois, EPA	

## **Flip Chart Notes, June 12, 2002**

- Point of compliance – 1 km downgradient (long distance) – ability to tell what the risks are is not good. Presumptive degradation.
  - Presumes ability to calculate numbers (in SAC and other models).
  - Non-degrade standards under state and federal regulations.
- LLW – assumption that LLW burial grounds have only LLW – actually they are MLLW disposal sites.
- TRU – Hanford is not a TRU disposal site.
- Assumptions with regard to caps and barriers performance.
- Cumulative impacts are a problem and are based on decisions not yet made. Refers to other documents – does not pull together all analyses. EIS should be over-arching document and isn't.
- Waste in this EIS wasn't fully characterized in the scoping by type or weight – e.g. TRU. There are questions about consistency with the PEIS.
  - Exclusions: PEIS did not include excluded waste.
  - PEIS did cover generation of new waste, but it appears that the numbers here are much higher than what was in the PEIS.
- Reliance on models that presume waste will move down is inaccurate and unreliable.
- Pre-1970 TRU waste – not addressed.
- Post-1970 TRU waste – not analyzed because of assumptions of going to WIPP.

### Groundwater-Vadose Zone

- Model fails to account for hazardous waste and the lack of a cover.
- Half-life durations – at risk for natural disasters – i.e. catastrophic floods.

### CDI

- No reference for using canyons for disposal.

### Waste Import

- Past HAB Advice 103, 98: this EIS should consider
  - Full life cycle costs of storage and disposal at each site.
  - Accurate estimates of these costs
  - Benefits of independent regulation of low-level radioactive waste disposal
- Groundwater monitoring system – not designed to be a RCRA monitoring system.
- Many wells are no longer reliable.
- EIS does not address liquids and mobilizers.
- Assumption of homogeneity of wastes in LLW trenches.
- Mixed waste is only acceptable for storage and treatment – not disposal.
- EIS says 14,000 – currently stored and generated thru 2008.  
205,000 – upper bound analysis.  
Exceeds upper bound scope in Waste Management PEIS.

- Chapter 5 – quantities of lead.
- Analysis should reflect deeper trenches.
- M-91 – not much quantitative analysis for making decisions.
- HLW not included.
- Reactor components not included.
- Spent nuclear fuel not included.
- Waste from Environmental Restoration under CERCLA not evaluated.
- Thoroughness, diligence, scientific basis for decision-making.
- Lots of standard EIS boilerplate – but doesn't really address issues.
- K Basin sludges – not addressed.
- EIS as decision-supporting not decision-making document – impacts not addressed –
  - Potential locations on site to do activities (not specified)
  - Potential impacts of this federal action on other major actions (particularly technetium and iodine)
- LTS doesn't seem to be addressed.
- Uranium-233 not addressed
- Adequacy of NEPA assessment for endangered species.
- NEPA problems with irretrievable impacts (“loosy goosey”)
- Section 7-12 - no consultation with tribes and TPA agencies.
- Location of groundwater wells

### Advice Points

- Readability (NEPA)
- Waste importation (past advice)
- Pre-1970 and post-1970 TRU
- Point of compliance
- Pre-1970 waste not addressed
- Trenches – LLW – MLLW
- Modeling, caps, etc. – assumptions
- NEPA compliance – incomplete
- Use items from previous advice as framework
- Budget numbers not available
- December 31 deadline (HQ) – under NEPA
- Next version be another draft – under NEPA
- Impacts of this major action on other major actions
- K Basin sludge